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17 **UNITED STATES DISTRICT COURT**

18 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

20 **Edwardo Munoz**, individually and on  
behalf of all others similarly situated,

21 Plaintiff,

22 v.

23 **7-Eleven, Inc.**, a Texas corporation,

24 Defendant.

Case No. 2:18-cv-03893-RGK-AGR

25 **JOINT STIPULATION FOR AN  
EXTENSION OF ALL REMAINING  
DEADLINES**

26 Judge: Hon. R. Gary Klausner

27 Complaint Filed: May 9, 2018  
Trial Date: July 2, 2019

1           **TO THE HONORABLE COURT AND THE CLERK OF THE COURT:**

2           Pursuant to Local Civil Rule 7.1, Plaintiff Edwardo Munoz (“Plaintiff” or  
 3           “Munoz”) and Defendant 7-Eleven, Inc. (“Defendant” or “7-Eleven”) by and  
 4           through their respective counsel of record, hereby stipulate and request that the Court  
 5           enter an Order as follows:

6           WHEREAS, Plaintiff filed this action on May 9, 2018 (Dkt. 1);

7           WHEREAS, on October 22, 2018, this Court entered a Scheduling Order and  
 8           Order for Jury Trial, which set, among other deadlines, the following remaining  
 9           deadlines:

- 10           a.      Discovery Cut-Off Date:           April 3, 2019;
- 11           b.      Motion Cut-Off Date:           April 17, 2019;
- 12           c.      Pretrial Conference:           June 17, 2019; and
- 13           d.      Jury Trial (Est. 3 days):       July 2, 2019 at 9:00 a.m.

14           (Dkt. 44, 45.)

15           WHEREAS, to date, the Parties have been diligently litigating the case,  
 16           including fully briefing Defendant’s Motion to Dismiss, Plaintiff’s Motion for Class  
 17           Certification, and Plaintiff’s Proposed Class Notice Plan;

18           WHEREAS, the Parties have also been immersed in extensive discovery,  
 19           including: serving and responding to various written discovery requests, exchanging  
 20           informal discovery, serving a subpoena to produce documents upon Sterling  
 21           Infosystems, Inc., conducting the Rule 30(b)(6) deposition of Defendant’s  
 22           representative, and preparing for Plaintiff Munoz’s deposition scheduled for  
 23           February 20, 2019;

24           WHEREAS, the Parties have also reached an impasse regarding several  
 25           discovery requests and are in the process of resolving the dispute via the Magistrate  
 26           Judge’s discovery dispute procedures;

27           WHEREAS, in a good faith effort to resolve this matter, the Parties have  
 28           agreed to attend a full-day mediation session on April 9, 2019 in Toronto, Canada

**JOINT STIPULATION FOR AN EXTENSION  
OF ALL REMAINING DEADLINES**

1 with Mediator Michael E. Dickstein (this was the only date and location available for  
2 Mr. Dickstein);

3 WHEREAS, despite efforts to meet the present deadlines, the Parties request a  
4 brief 30-day extension of all remaining deadlines, including the discovery cut-off  
5 date and the trial date;

6 WHEREAS, this stipulation is not entered into for the purpose of delay;

7 WHEREAS, the extension will enable the Parties to devote their time and  
8 resources into resolving all remaining discovery matters and potentially resolving the  
9 case altogether;

10 THEREFORE, in consideration of the foregoing, the Parties, by and through  
11 their undersigned counsel, hereby stipulate, agree, and request that the Court enter an  
12 Order as follows:

- 13 1. That all remaining deadlines be extended by 30-days, as follows:
  - 14 a. Discovery Cut-Off Date: May 3, 2019;
  - 15 b. Motion Cut-Off Date: May 17, 2019;
  - 16 c. Pretrial Conference: July 17, 2019; and
  - 17 d. Jury Trial (Est. 3 days): August 15, 2019 at 9:00 a.m.

18  
19 **IT IS SO STIPULATED.**

20 Dated: February 18, 2019

21 **Edwardo Munoz**, individually and on behalf  
22 of all others similarly situated,

23 By: /s/ Steven L. Woodrow  
24 One of Plaintiff's Attorneys

25 Mike Arias (CSB #115385)

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**JOINT STIPULATION FOR AN EXTENSION  
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*Attorneys for Plaintiff Edward*

Dated: February 18, 2019

7-Eleven, Inc.,

By: /s/ Delavan J. Dickson  
One of Defendant's Attorneys

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*Attorneys for Defendant 7-Eleven, Inc.*

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above titled document was served upon counsel of record by filing such papers via the Court's ECF system on February 18, 2019.

/s/ Steven L. Woodrow